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| GLOBAL FORCE |) | |
| ENTERTAINMENT, INC. and |) | |
| JEFFREY JARRETT |) | |
| |) | CIVIL ACTION NO. 3:18-cv-00749 |
| Plaintiffs/Counter-defendants, |) | |
| |) | CHIEF JUDGE CRENSHAW |
| v. |) | MAGISTRATE JUDGE JOE BROWN |
| |) | |
| |) | |
| ANTHEM WRESTLING |) | JURY DEMAND |
| EXHIBITIONS, LLC, |) | |
| |) | |
| Defendant/Counterclaim-Plaintiff. |) | |

Plaintiffs Global Force Entertainment, Inc. and Jeffrey Jarrett (collectively “Plaintiffs”) and Defendant Anthem Wrestling Exhibitions, LLC (“Defendant”), respectfully request the Court modifies the Scheduling Order and states the following in support:

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Failure to State A claim and/or Lack of Subject Matter Jurisdiction, solely with respect to the copyright claim.

5. On June 27, 2019 (Dkt. 82), this Court granted Plaintiffs' and Defendant's Joint Agreed Motion to Modify Scheduling Order (Dkt. 81) and set forth the following deadlines:

- a. Completion of all written discovery and deposition of all fact witnesses on or before December 6, 2019;
- b. Identify and disclose all expert witnesses and reports on or before December 6, 2019;
- c. Identify and disclose all rebuttal expert witnesses and reports on or before January 13, 2020;
- d. Deposition of expert witnesses on or before January 31, 2020; and
- e. All dispositive motions to be filed on or before February 14, 2020, with responses to dispositive motions shall be filed within 28 days after the filing of the motion and any optional replies, limited to 5 pages, may be filed within 14 days after the filing of the response.

6. Due to scheduling conflicts, the parties filed another Joint Agreed Motion to Modify Scheduling Order on November 4, 2019. (Dkt. 91). The Court granted the parties' Joint Agreed Motion and set forth the following deadlines (Dkt. 92):

- a. Completion of all written discovery and deposition of all fact witnesses on or before December 6, 2019;
- b. All expert witnesses and reports shall be identified and disclosed on or before January 7, 2020;

- c. All rebuttal expert witnesses and reports shall be identified and disclosed on or before January 28, 2020;
- d. All expert witnesses shall be deposed on or before March 1, 2020; and
- e. All dispositive motions to be filed on or before February 14, 2020, with responses to dispositive motions shall be filed within 28 days after the filing of the motion and any optional replies may be filed within 14 days after the filing of the response.

7. While the parties have continued to diligently work to complete discovery, the parties have cooperatively agreed to an extension of the expert disclosure deadlines to allow for the production and review of additional documents and discovery responses by Defendant that Plaintiffs submitted more than 30 days prior to the discovery cut-off deadline.

8. Therefore, the parties request that the Court enter an Amended Scheduling Order solely as it pertains to deadlines for expert-related discovery as follows:

- a. Identify and disclose all expert witnesses and reports on or before February 8, 2020;
- b. Identify and disclose all rebuttal expert witnesses and reports on or before February 28, 2020; and
- c. Deposition of expert witnesses on or before March 30, 2020.

9. The parties do not seek to modify the deadline for dispositive motions.

10. The requested extension conforms to the requirements of Local Rule 16.01(d)(2.f) that the dispositive motion deadline, including response and reply briefs, are at least 90 days in advance of the trial date.

WHEREFORE, the parties respectfully request the Court amend the expert disclosure and expert deposition deadlines as set forth above and in the proposed Order submitted herewith.

Dated: January 6, 2020

Respectfully submitted,

MILLER LEGAL PARTNERS PLLC

/s/ Hayley H. Baker

Samuel F. Miller, TN Bar No. 22936

Nicholas R. Valenti, TN Bar No. 35420

Sara R. Ellis, TN Bar No. 30760

Hayley H. Baker, TN Bar No. 37439

Fifth Third Center – Suite 2000

424 Church Street

Nashville, Tennessee 37219

Phone: 615.988.9590

Facsimile: 615.988.9559

Email: smiller@millerlegalpartners.com

nvalenti@millerlegalpartners.com

sellis@millerlegalpartners.com

hbaker@millerlegalpartners.com

Counsel for Plaintiffs

BASS, BERRY & SIMS PLC

/s/ Paige W. Mills

Paige W. Mills, TN Bar No. 16218

Ryan A. Lee, TN Bar No. 31937

150 Third Avenue South, Suite 2800

Nashville, TN 37201

Phone: (615) 742-6200

Email: pmills@bassberry.com

ryan.lee@bassberry.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of January 2020, the foregoing document was filed via ECF and served by email upon the following:

Paige W. Mills

Ryan A. Lee

Bass, Berry & Sims PLC
150 Third Avenue South, Suite 2800
Nashville, TN 37201
(615) 742-6200
pmills@bassberry.com
ryan.lee@bassberry.com

/s/ Hayley H. Baker